

Federal Defenders  
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May 19, 2025

**By email and ECF**

The Honorable Ann M. Donnelly  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn New York 11201

**Re: United States v. Svetlana Dali, 25 CR 14 (AMD)**

Dear Judge Donnelly:

I write, pursuant to Federal Rule of Criminal Procedure 30(a), to request that the Court give the following jury instructions at the appropriate time:

**Limiting Instruction  
(to be given when evidence of uncharged conduct is admitted)**

Let me remind you that the defendant is not on trial for trespassing at other airports, conduct that is not alleged in the indictment. Accordingly, you may not consider this evidence as a substitute for proof that the defendant committed the crime charged. Nor may you consider this evidence as proof that the defendant has a criminal personality or bad character. The evidence of these alleged trespasses was admitted for a much more limited purpose, and you may consider it only for that limited purpose.

If, and only if, you determine that the defendant knowingly trespassed at other airports, then you may, but you need not, draw an inference that in doing the acts charged in the indictment, the defendant acted knowingly and intentionally and not because of some mistake, accident or other innocent reasons.

This evidence may not be considered by you for any other purpose. Specifically, you may not use this evidence to conclude that because the

trespassed at other airports that she must also have committed the acts charged in the indictment.<sup>1</sup>

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Michael K. Schneider, Esq.

cc: Clerk of the Court (by ECF)  
AUSA Brooke Theodora (by ECF and email)

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<sup>1</sup> Adapted from Sand, *Modern Federal Jury Instructions*, Instr. 5-25.